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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)	
Advanced Television Systems	)	
and Their Impact upon the	)	MM Docket No. 87-268
Existing Television Broadcast	)	
Service	)	

JOINT BROADCASTER COMMENTS

One-Hundred and Five
Broadcast Organizations

November 16, 1992

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SUMMARY

These joint comments are submitted on behalf of one-hundred and five local broadcast companies, networks and broadcast trade associations ("Broadcasters"), the fifth effort in this proceeding to present the Commission with a unified industry view on critical ATV issues. These comments address the allotment/assignment issues raised in the Second Further Notice of Proposed Rulemaking released by the Commission on August 14, 1992 in MM Docket No. 87-268 ("Second Further Notice").

Broadcasters commend the Commission for the timely issuance of the Second Further Notice and for the extraordinary effort the Commission has dedicated to addressing the many challenges of providing the opportunity for free, over-the-air, localized television to implement ATV efficiently, effectively and with as little disruption to the public as possible. Broadcasters are optimistic that this goal can be achieved as this proceeding continues to evolve through the close and ongoing cooperative efforts of the Commission, its ATV Advisory Committee, and the input of the broadcast industry and other interested parties.

The Second Further Notice takes an important step toward this goal in proposing that its ATV allotment process will seek to accommodate all eligible broadcasters with an ATV channel and be predicated on the use of existing station sites. Broadcasters fully agree with these proposals which will help preserve and improve existing broadcast service in

the implementation of ATV and also serve to maximize ATV coverage while minimizing interference and implementation expense.

Broadcasters continue to believe strongly that the benefits of full accommodation and site-specific planning can best be realized by pairing each existing NTSC channel with a specific ATV channel based on objective replication/coverage maximization principles. Such a pairing plan flows logically from the Commission's proposed site-specific allotment plan and has received broad support not only from the broadcast industry but from the Advisory Committee as well. It is designed to maximize replication of existing service, maximize total ATV coverage, and minimize interference to surrounding NTSC and ATV stations. These objectives serve the interests of the viewing public who currently rely on NTSC service but who should be given the opportunity to obtain ATV service in the future without being disenfranchised by reduced or mismatched service areas. A pairing approach using the neutral principles of replication/maximization offers the best possible means of satisfying the greatest number of licensees and providing a sounder basis for stations to negotiate channel assignments, avoiding the "winners" versus "losers" atmosphere alternative approaches may engender. A possible alternative suggested in the Second Further Notice of random pairing and providing all stations with a 55-mile service area

would entail substantial service penalties to a majority of stations.

Broadcasters also believe VHF-band allotments will be essential to the implementation of broadcast ATV in order to preserve and protect existing and future UHF service. Indeed, preliminary coverage analysis indicates that, depending upon the specific characteristics of the ATV system that is ultimately selected, a viable ATV Table of Allotments may need to include between 100 and 200 VHF ATV stations. An effort to "pack" ATV allotments into the UHF band will result in unrealistic co- and adjacent-channel ATV-to-ATV and ATV-to-NTSC spacings among stations, and consequently lead to a severe loss in ATV coverage as well as a substantial increase in interference to existing NTSC UHF stations. While the Commission has proposed to avoid this latter result by requiring new ATV stations to operate at reduced power during the transition period, this proposal merely shifts the service area loss from NTSC to ATV.

The allotment/assignment issues raised in the Second Further Notice will come into sharper focus as the remaining test data regarding the proponent ATV systems becomes available and is analyzed. Broadcasters look forward to working with the Commission and its staff to refine the allotment/assignment principles based on this data and analysis. Broadcasters believe such continuing cooperative efforts and the record established in this proceeding will

provide the Commission with a strong foundation on which to decide upon the guiding allotment/assignment principles for ATV. These principles can then be applied to the test results of the ATV system recommended by the Advisory Committee to develop a draft table of ATV allotments/assignments to be issued in conjunction with the Commission's proposed selection of an ATV system standard.

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JOINT BROADCASTER COMMENTS

The undersigned one-hundred and five local broadcast companies, networks and broadcast trade associations (hereinafter "Broadcasters") hereby comment upon the Second Further Notice of Proposed Rulemaking, FCC 92-332, released in the above-captioned docket on August 14, 1992 ("Second Further Notice").[1/] This marks the fourth occasion in this proceeding in which the broadcast industry has filed joint comments.[2/]

1/ In response to requests for additional information and additional time to file comments, the Commission clarified certain issues raised in the Second Further Notice and extended the time for filing comments to November 16 and the time for filing reply comments to December 16. Order Extending Time for Filing Comments, MM Docket No. 87-268, Mimeo No. DA 92-1344 (adopted Sept. 29, 1992; released Sept. 30, 1992)("Extension Order"); Order Extending Time for Filing Comments, MM Docket No. 87-268, Mimeo No. DA-1445, (adopted Oct. 19, 1992; released Oct. 20, 1992).

2/ See Joint Comments, MM Docket No. 87-268, filed November 30, 1988 ("Joint Comments I"); Joint Comments, MM Docket No. 87-268, filed December 20, 1991 ("Joint Comments II"), and Joint Comments, MM Docket No. 87-268, filed July 17, 1992 ("Joint Comments III"). See also Petition for Notice of Inquiry, filed February 13, 1987.

I. INTRODUCTION

The Second Further Notice addresses the policies, procedures and technical criteria to be used in allotting ATV channels, marking the Commission's first step "in the planned series of actions leading to the adoption of a final ATV Table of Allotments." Second Further Notice at ¶ 6. Broadcasters fully support the Commission in its efforts to adopt an ATV Table of Allotments/Assignments at the same time it adopts a terrestrial ATV standard, id. at ¶ 4. Indeed, a timely distribution of ATV channels has been among Broadcasters' highest priorities. See Joint Comments III at 2. Broadcasters also commend the Commission for actively seeking comment on the allotment/assignment issues raised in the Second Further Notice, including its avowed willingness "to consider alternative proposals for the underlying principles set forth [in the Second Further Notice] that will guide the development of the ATV Table ...." Second Further Notice at ¶ 6.

As the Second Further Notice recognizes, any final Table of ATV Allotments must be based on data from the testing of the proposed ATV systems being performed under the auspices of the Commission's ATV Advisory Committee. Id. See also Extension Order, Attachment at 2. Because of the significant unknowns in this process and the likelihood that the proponent systems will vary substantially in performance, the Second

Further Notice is indeed prudent in cautioning that the "sample" ATV Table set forth in Appendix D of the Second Further Notice "may differ significantly from the final ATV Table ...." Id. at D-1. Broadcasters join the Commission in emphasizing that any meaningful effort to assign specific ATV channels to specific NTSC stations must await the development of specific system performance data through the process ably overseen by the Advisory Committee and effectively conducted by the Advanced Television Test Center.

Critical to the success of this process has been and will continue to be the extraordinary accessibility, cooperativeness and responsiveness of the Commission's staff, both on an ongoing basis and in response to specific requests. See Extension Order, Attachment ("Information Regarding Technical Assumptions Used In The Second Further Notice Of Proposed Rulemaking in Docket No. 87-268"). A close working relationship between the staff and industry representatives is emerging and, we believe, will lead to the development of allotment/assignment procedures and principles that are fair and equitable and which will optimize the prospects for a smooth ATV implementation and minimize the prospects for dispute, dissension and delay.

Broadcasters believe the Commission should decide upon the guiding allotment/assignment principles based on the record developed in this proceeding, including the cooperative

coverage assessment endeavors undertaken by the Commission's staff and representatives of the broadcast industry. These principles can then be applied to the test results of the ATV system recommended by the Advisory Committee to develop a draft table of allotments/assignments to be issued in conjunction with the Commission's proposed selection of an ATV system standard.

II. BASIC OBJECTIVES

While emphasizing that its sample Table is merely illustrative and will be superseded by tables based on actual ATV system test data, Second Further Notice proposes several overarching principles and criteria to govern the allotment/assignment process. These principles include the following five allotment objectives:

> (1) Accommodating all eligible broadcasters with an ATV channel,[3/] Second Further Notice at ¶ 10;
>
> (2) Predicating allotments on the use of existing station sites, Id. at ¶ 33;

[3/] The parties eligible for ATV channels during the initial assignment period will be all full-service broadcast licensees, permittees authorized as of October 24, 1991, the date of adoption of the Notice of Proposed Rulemaking, MM Docket No. 87-268, 6 FCC Rcd 7024 (1991), and all parties with applications for a construction permit on file as of October 24, 1991. See Second Report and Order/Further Notice of Proposed Rulemaking, MM Docket No. 87-268, 7 FCC Rcd 3340, at ¶¶ 8-9 (1992) ("Second Report and Order"); Memorandum Opinion and Order/Third Report and Order/Third Further Notice of Proposed Rulemaking, MM Docket No. 87-268, FCC 92-438, at ¶ 8 (adopted Sept. 17, 1992; released Oct. 16, 1992) ("Third Report and Order").

(3) Maximizing ATV service areas with a goal of providing each station a minimum 55-mile service area, Id. at ¶ 15;

(4) Making ATV allotments exclusively to the UHF band, Id. at ¶ 18; and

(5) Giving a relative preference to new ATV operations over NTSC operations in the allotment process. Id. at ¶ 21.

The Commission and its staff have indicated flexibility and open-mindedness as to the last three principles, recognizing that other options might better serve the public interest and asking for comment on these other options.

Broadcasters fully agree with the proposals in the Second Further Notice to accommodate all existing broadcasters and to base the allotment table on the use of existing transmitter sites. These are essential steps in preserving and improving existing broadcast service in the ATV environment, in maximizing ATV coverage and in minimizing interference and transition expense. See Tentative Decision and Further Notice of Inquiry, MM Docket No. 87-268, 3 FCC Rcd 6520, 6537 (1988) ("Tentative Decision").

But, as explained more fully below, Broadcasters believe that the benefits of full accommodation and site-specific planning cannot be realized without pairing each existing NTSC channel with a specific ATV channel.[4/] Joint

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[4/] It should be clarified that contrary to a suggestion in the Further Notice, at ¶ 13, PBS, APTS, and Fox, Inc., as well as ninety-eight other broadcast organizations, endorsed a pairing approach based on these principles as set forth in (continued...)

Comments III at 4-11; Joint Comments II at 3-12. Broadcasters continue to believe strongly that this approach will lead to a more spectrum-efficient allotment table by assuring the continuity of existing service, maximizing ATV coverage, minimizing NTSC interference, and providing a smoother and less contentious implementation process.

Broadcasters also continue to believe that replication of existing service areas, maximization of ATV coverage areas and minimization of interference to existing station service areas should remain the fundamental guideposts for distribution of channels among communities and among co-located licensees. Id. See also Letter to FCC Chairman from Broadcast Representatives (March 10, 1992).[5/] Broadcasters are very concerned with the potentially negative impact of the alternative proposals in the Second Further Notice to pack the entire ATV service in the UHF band and to use as a starting point a theoretical 55-mile minimum service area for all stations. Compared to the replication/maximization approach, these alternative proposals will reduce total ATV coverage,

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[4/](...continued)
Joint Comments III at 4-11. In addition, PBS, APTS, and Fox were each signatories to the March 10, 1992 "Broadcast Caucus" letter which also set forth these principles, as indicated in the Further Notice at ¶ 12 n.16.

[5/] For the reasons described in footnote 12, Fox believes that the replication objective should take into account total population served by each station as well as continued coverage to existing service areas.

reduce the extent to which current NTSC service areas are served by ATV transmissions and increase the interference from ATV service to existing NTSC service. See §§ II & III infra.[6/]

Broadcasters have conducted a preliminary coverage analysis to assess the implications of these various policy options. This analysis, the full results of which shortly will be placed in the record in this proceeding, utilized the basic coverage prediction methodology adopted by the ATV Advisory Committee in consultation with the Commission's staff. See Appendix A. It utilized the Commission's data base of existing stations, the standard FCC service prediction methodology and the most recent ATV test data. The study analyzed, first, the allotment scheme set forth in the sample Table, pairing NTSC and ATV channels randomly and giving each station a 55-mile service area. The study then amended the Table by utilizing the best channels available in both the VHF and UHF bands, pairing specific NTSC and ATV channels based on degree of service area replication and, wherever possible, extending the service areas of all ATV stations to the maximum

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[6/] Broadcasters also support the proposal of the public television interests that the Commission include among its allotment principles the preservation, in accordance with the principles articulated in the Commission's Second Report and Order, of the noncommercial educational reserve. By making the preservation of reserved channels one of the allotment criteria, the Commission will assure that public television will continue to make its unique contribution to the nation's television service during and after the transition to ATV.

extent up to the area served by the largest NTSC station in each market.

The study reveals that the random pairing/UHF only/55-mile service area approach provided a cumulative total ATV coverage for all ATV stations of 40,610,972 square kilometers. Modifying this approach to provide for pairing and replication/maximization expanded coverage to 43,931,648 square kilometers, an improvement of nearly 4,000,000 square kilometers (or almost 9 percent) in service area.

Looking at total coverage from the perspective of individual stations yielded a similar picture. Thus, under the alternative principles, including random pairing, only 57.6 percent of stations received total ATV coverage areas at least as large as their current service areas and only 63.5 percent achieved as much as 95 percent of their current service areas. Using pairing, VHF channels and replication/maximization, 94 percent of all stations received total ATV service areas as large or larger than today's service areas and 98 percent were in excess of 95 percent coverage of current NTSC service.

The differences between the two approaches are even more significant when analyzed solely from the perspective of the degree to which service was continued to the same areas. Under a random pairing/UHF-only/55-mile service-area approach, only 48.9 percent of existing stations were able to continue

service to 100 percent of their existing NTSC service areas; only 56 percent continued service to as much as 95 percent of current service areas. By contrast, optimizing the allotments and assignments as suggested above permitted 85 percent of stations to continue service to 100 percent of their current service areas; 95 percent of all stations continued to reach at least 95 percent of their existing service areas. Finally, the random pairing/UHF/55-mile plan caused at least 37 percent more interference to existing stations than the optimal approach.

These numbers are, of course, preliminary; the actual underlying values may vary substantially depending upon the specific ATV system utilized and other variables selected in the allotment/assignment methodology. But there is no reason to think that the relative performance of the two approaches will differ significantly, at least not in any way that will benefit from the random pairing/UHF/55-mile limit approach; whatever the underlying ATV system performance capabilities, pairing, replicating and utilizing all available channels will continue to provide significant coverage benefits.

There is, moreover, an important sense in which these raw numbers understate the severity of the differential. The "lost" service areas, both ATV and NTSC, are located disproportionately in or near highly "crowded" areas, e.g.,

the northeast, which are by definition those with relatively high population densities. These areas are much more densely populated on average than the few ATV service areas which would increase under the uniform 55-mile approach, many of which are unserved only because existing stations have not found it economical to serve them. Thus it would appear that the relative loss of service under the random pairing/UHF/55-mile approach will be even greater when measured in terms of population rather than in area and thus contrary to the Commission's stated intent.

Whether couched in terms of population or area, these statistics represent very significant potential "service losses" to the public. The Commission, the courts and Congress have always given great weight to policies which protect the public against such service losses. See, e.g., Hall v. FCC, 237 F.2d 567, 572 (D.C. Cir. 1956) ("That ... curtailment of service is not in the public interest is axiomatic."); Television Corporation of Michigan v. FCC, 294 F.2d 730, 732 (D.C. Cir. 1961).

We reiterate that there is considerable common ground in the allotment/assignment proposals urged by Broadcasters and those set forth in the Second Further Notice. As discussed below, where these principles diverge, Broadcasters believe that nearly all of the benefits sought to be achieved by the alternative allotment principles, including

a substantial reduction in the VHF-UHF disparity and swift disposition of the channels, can be accomplished without the service penalties described above. We are also encouraged by the growing consensus on procedural scenarios. We look forward to analyzing the remaining proponent test data and to working with the Commission and its staff to refine the allotment/assignment principles to better meet our common public policy objectives.

III. PAIRING NTSC AND ATV CHANNELS ON THE BASIS OF COVERAGE AND INTERFERENCE CONSIDERATIONS.

Broadcasters again urge the Commission to adopt an ATV allotment/assignment plan that pairs specific ATV and NTSC channels on the basis of current transmitter sites, service areas and interference considerations. See Joint Comments II at 3-12; Joint Comments III at 4-11. Such a plan would compress the allotment and assignment process into a single administrative step for most stations, promote the co-location of ATV and NTSC facilities, maximize replication of existing service, and maximize total ATV coverage while minimizing interference to surrounding NTSC and ATV stations. In this way the allotment/assignment process would be efficiently streamlined and rationally based on objective technical criteria far superior to the speculative "winners" and "losers" atmosphere that could be created by a random, first-to-file/lottery method of assigning ATV channels. Second

Report and Order at ¶ 35. Pairing specific NTSC and ATV channels will also facilitate the reservation of channels for noncommercial educational use and obviate the need for additional proceedings in order to set aside channels for educational purposes.

The pairing concept flows logically from the adoption of a site-specific plan. The Second Further Notice, at ¶ 35, notes the "advantages in taking into account existing transmitter locations in the ATV allotment process," i.e., it would "facilitate more efficient spacing of ATV allotments" and allow cost savings through co-location. The Second Further Notice consequently proposes "to allot ATV channels on the basis of current transmitter sites, rather than community reference points." Id. It also recites Broadcasters' uncontrovertible observation that site-specific allotments are warranted by the sometimes substantial "deviations in the service areas which are possible within the group of channels available to allot to a given community ... ." Second Further Notice at ¶ 33. By not taking these divergences into account, a random assignment plan would create potentially serious mismatches between NTSC and ATV coverage areas which could disenfranchise large numbers of viewers. See Joint Comments II at 6-7.[7/]

[7/] This mismatch between NTSC and ATV coverage areas is of great concern to state educational television networks which

(continued...)

Given the overwhelming support for a pairing approach,[8/] and the Commission's own acknowledgment of the benefits of incorporating site-specific criteria in the allotment process, Broadcasters believe it would be inconsistent and unwise to create a Table of ATV Allotments based on current transmitter sites but then fail to assign ATV channels to the specific NTSC sites from which they are derived. The Commission should take the site-specific allotment plan to its logical and rational conclusion by

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[7/](...continued)
attempt to serve all the residents of their state. Any significant mismatch between NTSC and ATV coverage areas could impair their ability to achieve that goal and thus deprive residents, typically in rural areas, of access to public television programming. Public television interests are submitting comments elaborating further on these issues.

[8/] The Commission's ATV Advisory Committee has recommended a site-specific pairing plan based on the extensive analysis performed by its various working parties concerning the best means of implementing ATV in the limited spectrum available. See Fifth Interim Report of the FCC Advisory Committee on ATV at 12 (March 24, 1992). Working Party 1 of the Implementation Subcommittee recommended that the Commission "consider the benefits of site-specific ATV assignments" given that such a plan would promote co-location, and, for many licensees, "eliminate the expense and time involved in securing a second site for ATV broadcasting." Implementation Subcommittee Fifth Interim Report to the FCC Advisory Committee on ATV, Attachment A at 2. Working Party 3 of the Planning Subcommittee also has urged the adoption of a pairing plan, finding that it would "provide[] the fundamental basis for an ATV plan, and [would] serve as a baseline for implementation." Fifth Interim Report of the Spectrum Utilization and Alternatives Working Party of the Planning Subcommittee at 26 (February 3, 1992).

adopting a pairing plan that assigns as well as allots ATV channels on the basis of current transmitter sites.[9/]

IV. REPLICATION/MAXIMIZATION REMAINS PREFERABLE TO MINIMUM SPACING REQUIREMENTS AND 'MINIMUM' SERVICE AREA GUARANTEES.

A. Broadcasters Reiterate Their Support For An Allotment/Assignment Plan Based On Replication/Maximization Principles.

Broadcasters continue to advocate the adoption of an initial allotment/assignment approach that pairs existing NTSC channels with ATV channels on the basis of replication/coverage maximization principles.[10/] Joint Comments III at 4-10. These principles are set forth in the previous joint

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[9/] It is worth observing that the site-specific allotment proposal in the Second Further Notice could lead to de facto site-specific channel assignments ("pairing") for a majority of stations, but not based on objective technical criteria intended to maximize service. The sample table issued by the Commission "pairs" 48 percent of the stations, i.e., those sites with a single station at them, and shows many other sites with only a few channels on them. For example, the Sample Table allots single ATV channels to Secaucus, Linden, and Paterson, New Jersey, and seven stations to New York City. In fact all ten of those stations are co-located, i.e., within three miles of each other. The apparent pairing results from the fact that the "allotment software [used to generate the Sample Table] actually considers the common site of a group of channels allotted to more than one community to be a single location for allotment purposes and then randomly associates the channels allotted at that site with the communities." Extension Order, Attachment at 3. Broadcasters strongly believe that a far superior approach to such random pairing would be to pair ATV and NTSC signals on the basis of objective replication/maximization principles.

[10/] The Second Further Notice, at ¶ 26, reflects a misunderstanding that Broadcasters "support use of minimum spacing standards for the allotment of ATV channels."

comments, id. at 5-6, as well as in the Second Further Notice at footnote 16, and have been embraced by a wide cross-section of broadcasters -- large and small market stations, VHF and UHF band licensees, commercial and noncommercial stations, networks, affiliates and independents -- as well as the Advisory Committee. See Fifth Interim Report of the Spectrum Utilization and Alternatives Working Party of the Planning Subcommittee of the Advisory Committee on ATV at 26-27 (Feb. 3, 1992).[11/]

The Commission and its staff have repeatedly emphasized their interest in these principles. But the Second Further Notice, at ¶ 14, expresses concern that Broadcasters' replication/maximization objectives "may not be attainable", that a "significant" number of cases would be encountered in which an "acceptable" degree of replication could not be obtained, and that "all licensees might not be satisfied with the allotments and assignments the plan would produce." But Broadcasters continue to believe an approach based on these objectives is more likely to achieve full accommodation as well as maximize ATV coverage and therefore will receive widespread support from the industry and the public. See Joint Comments III at 9-10.

[11/] PS/WP3 is currently employing fully developed software to create allotment/assignment tables based on a pairing approach using these principles for each of the ATV systems tested in the Advisory Committee process.

As noted above, under a replication/maximization plan, many stations will be able not only to serve virtually all of their existing service areas but, assuming the proponent systems perform as expected, larger areas and greater populations than they serve today. Existing disparities in relative coverage among stations will consequently be substantially reduced. See Second Further Notice at ¶ 18.

As noted in the Commission's recent order extending the time to file comments, the industry is working vigorously to educate its members about the allotment/assignment process and the benefits in total service, continuity and new service which a pairing, replication/maximization approach will bring. See Order Extending Time For Filing Comments, MM Docket No. 87-268, Mimeo No. DA-1445 (adopted Oct. 19, 1992; released Oct. 20, 1992). Despite these efforts, which extend far beyond the preparation of joint comments, there is no assurance that every single licensee will be satisfied with the results of the replication/maximization approach. But Broadcasters believe that neutral principles such as replication/maximization will do a far better job of satisfying the greatest number of licensees and providing a sounder basis for subsequent licensee negotiations to fine-tune the basic plan. Greater licensee harmony would result from efforts to eliminate the perception as well as the

reality that there will be "winners" and "losers" in the allotment/assignment process.[12/]

B. The 55-Mile Service Area 'Guarantee' Will Reduce ATV Coverage.

The Second Further Notice, at ¶ 15, also proposes to adopt as a primary objective the goal of ensuring that all ATV stations are able to provide service within a radius of approximately 55 miles. Second Further Notice at ¶ 15. Unfortunately, as the Commission has pointed out elsewhere, this proposal will effectively reduce the service radius of all ATV stations to a maximum of 55 miles. Extension Order, Attachment at 1-2 ("In proposing an 85-90 km goal for the maximum service area of ATV stations, the Second Further Notice chose the approximate distances now reached by the noise-limited service area of most existing UHF TV stations."). Sixty percent of today's stations have service radii greater than 55 miles. Thus, as demonstrated by the coverage analysis reported above, a 55-mile maximum service

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[12/] Fox believes that replication of the same service area will be more difficult to achieve than replication of service to the same total number of people. In its separate comments, Fox intends to present preliminary ATV coverage analyses utilizing the TIREM propagation prediction model, a model which takes into account terrain and other factors not accounted for in the standard f(50,50) curve propagation model.

area can be accomplished only by reducing the service areas of a substantial majority of today's stations.[13/]

Like the first-to-file/lottery assignment proposal, the "55-mile radius" principle takes no account of the value of perpetuating service by individual stations to their current audiences. And, as noted above, these reductions in service will in many instances occur in areas which are more likely to be densely populated or otherwise dependent upon the broadcast service than are the areas which may be added.

Under a replication/maximization regime, however, the coverage-area disparities among all types of stations will decline substantially and most stations, particularly those with relatively smaller service areas, will be able to improve their current coverages. But only under a replication/maximization approach can these changes be effected without the disenfranchisement of large numbers of viewers and without significant disruption to the existing system.

[13/] Broadcasters realize that this defect could be ameliorated somewhat by applying a maximization process to the approach set forth in the Second Further Notice. But it is more efficient and effective to design the allotment/assignment process from the beginning with maximization as a principal goal.